

DISCOVERY PLAN WORKSHEET

Tier I Pre-Settlement Discovery

TO BE COMPLETED IN ALL CASES

Deadline for completion of Rule 26(a) initial disclosures
and HIPAA-complaint records authorizations:

Completion date for Phase I Discovery
as agreed upon by the parties:

(See paragraph 7 of joint letter requirement)

Status conference TBD by the court:

(Generally 15 days post Tier I Discovery)

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings:

(Presumptively 15 days post status conference)

All fact discovery completed by:

*(Presumptively 9 months after deadline for
joining parties/amend the pleadings)*

Expert discovery completed by:

*(Presumptively 3 months after close of fact
discovery)*

Final date to take first step in dispositive motion practice:

*(Parties are directed to consult the District Judge's
individual rules regarding such motion practice.*

(Presumptively 30 days after close of discovery)

Joint Proposed Pretrial Order to be
submitted:

*(30 days after dispositive motion
practice deadline)*
